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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

KIMETRA BRICE, EARL BROWNE,  
 and JILL NOVOROT,

Plaintiffs,

v.

MIKE STINSON; LINDA STINSON; 7HBF  
 NO. 2, LTD.; STARTUP CAPITAL  
 VENTURES, L.P.; STEPHEN J. SHAPER,

Defendants.

Case No.: 3:19-cv-01481-WHO

KIMETRA BRICE, EARL BROWNE, and JILL  
 NOVOROT,

Plaintiffs,

v.

HAYNES INVESTMENTS, LLC, and  
 L. STEPHEN HAYNES,

Defendants

Case No.: 3:18-cv-01200-WHO

**PLAINTIFFS' NOTICE OF  
 SETTLEMENT AS TO DEFENDANT  
 STARTUP CAPITAL VENTURES, L.P.**

**NOTICE OF SETTLEMENT**

Plaintiffs, on behalf of themselves and all other Class Members, and Defendant Startup Capital Ventures, L.P. ("SCV"), hereby submit this notice to inform the Court that they have reached an agreement to settle this matter. After four mediation sessions with United States Magistrate Judge Thomas S. Hixon,

the parties reached a settlement in principle on July 9, 2021, and memorialized this agreement in a Stipulation and Agreement for Settlement, which has been circulated for signatures to all parties.<sup>1</sup>

No later than July 19, 2021, Plaintiffs intend to file a motion to sever as to SCV for the purpose of removing it from the pending action. Plaintiffs also intend to file a motion for preliminary approval of the class settlement no later than August 2, 2021.

Dated: June 3, 2021

Respectfully submitted,

By: /s/ Anna C. Haac

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<sup>1</sup> The class action settlement also includes the Plaintiffs and putative class members in the related *Gibbs* matter.

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